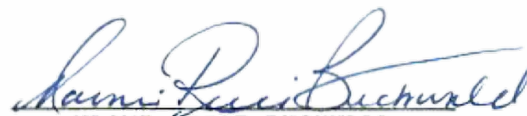


April 29, 2021

Application granted.

VIA ECF

Honorable Naomi Reice Buchwald, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

SO ORDERED.
NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
April 30, 2021

Re: Claudio Guazzoni v. LanceSoft, Inc.
Case No. 1:19-cv-08385

Dear Judge Buchwald:

The parties respectfully submit this joint letter pursuant to the Court's Individual Practice Rules to propose an extension of the previously established schedule for filings and discovery due to continued disruptions caused by the COVID-19 pandemic delays with third-party discovery:

Event	Deadline
Answer to Amended Complaint filed	Completed
Answer to Counterclaims filed	Completed
Initial disclosures under FRCP 26(a)(1) completed	Completed
Fact discovery completed	June 15, 2021
Interrogatories served	Completed
Initial requests for production of documents served	Completed
Responses to Interrogatories and document response served	Completed
Depositions completed	June 15, 2021
Expert discovery completed	June 30, 2021

The parties have continued to work amongst themselves and with Judge Freeman in an effort to reach an amicable resolution of the matter. The parties attended two conferences with the Court in January of 2021. Thereafter, Plaintiff served two third-party subpoenas. Plaintiff has met and conferred with both subpoenaed parties and currently await document productions from each. As a result, further discovery may be necessary.

On December 31, 2020, the parties wrote to the Court requesting an extension of the then-established schedule for filings and discovery. Notwithstanding the parties' efforts towards meeting and completing the deadlines established in the December 31, 2020 letter, more time is

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needed. Accordingly, the parties jointly request the revised schedule set forth above to permit us to proceed in that fashion. We thank the Court for its continued assistance with this matter and await the Court's instructions on how to proceed.

Respectfully submitted,

Dated: New York, New York
April 29, 2021

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